

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In re:

CHAPTER 11

FAMILY CHRISTIAN, LLC *et al.* ¹

**CASE NO. 15-00643-jtg
(Jointly Administered)**

Debtors.

HON. JOHN T. GREGG

**NOTICE OF PROPOSED AGENDA OF MATTERS SCHEDULED
FOR HEARING ON APRIL 14, 2015 AT 10:00 A.M.**

The above captioned debtors (the "**Debtors**") submit the following proposed agenda for matters scheduled for hearing on April 14, 2015 at 10:00 A.M.

I. UNCONTESTED MATTER

A. Final Order Authorizing Use Cash Collateral Pursuant to 11 USC § 363. [DN 14]

Response Deadline: April 09, 2015.

Objections / Responses Received. None filed.²

Related Documents:

1. Interim Order dated 2/19/15 [DN 114].

2. Second Interim Order dated 3/20/15 [DN 443].

Status. This matter is going forward. Debtors will request the Court for a Final Order that they believe is unopposed, subject to receiving comments from the U.S. Trustee.

¹ The Debtors are: Family Christian, LLC(Case No. 15-00643-jtg), Family Christian Holding, LLC (Case No. 15-00642-jtg), and FCS Giftco, LLC (Case No. 15-00644-jtg).

² No objections were filed prior to the noted deadline. However, prior objections (all believed to have been resolved, subject to receiving comments from U.S. Trustee) were filed by the following parties with respect to earlier hearings on interim orders entered by the Court: United States Trustee [DN 39]; Hendrickson Publishers LLC [DN 64]; Ad Hoc Consignment Parties [DN 364]; David C Cook's [DN365]; Mag Jewelry Co Inc.[DN357]

II. CONTESTED MATTER

- A. Debtors' Motion for (1) An Order (A) Approving Bidding Procedures for the Proposed Sale of Substantially All of the Debtors' Assets and The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases (B) Approving the Establishment of Cure Amounts and (C) Approving the Form and Manner of Notice Thereof, and (II) An Order (A) Authorizing Procedures for the Sale of Substantially All of the Debtors' Assets Free and Clear of Liens and (B) Authorizing the Assumption and Assignment of Executory Contracts and Leases, and (C) Granting Related Relief [DN 487]

Response Deadline: 4 p.m. (EST) April 11, 2015.

Objections / Responses Received.

1. Joinder Objection [DN 550] of Simon Property Group Inc. to Washington Prime Group Inc.'s Objection [DN 321]
2. Joinder Objection [DN 558] of The Taubman Landlords to Washington Prime Group Inc.'s Objection [DN 321]
3. Objection Of Washington Prime Group Inc. D/B/AWP Glimcher To Debtors' Motion For (I) An Order (A) Approving Procedures For The Proposed Sale Of Substantially All Of The Debtors' Assets And The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, (B) Approving The Establishment Of Cure Amounts, And (C) Approving The Form and Manner Of Notice Thereof; And (II) An Order (A) Authorizing Procedures For The Sale Of Substantially All Of The Debtors' Assets Free And Clear Of Liens, (B) Authorizing The Assumption And Assignment Of Executory Contracts And Leases, And (C) Granting Related Relief [DN 559]
4. Limited Objection by IA South Frisco Village LLC, IA Fultondale Promenade LLC, MB Sioux City Lakeport LLC, Inland Orlando Lagrange Rd. Outlot LLC and Greenville (Woodruff) WMB LLC's [DN 562]
5. United States Trustee's Objection To Debtors' Motion For (I) An Order (A) Approving Bidding Procedures For The Proposed Sale Of Substantially All Of The Debtors' Assets And The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, (B) Approving The Establishment Of Cure Amounts, And (C) Approving The Form And Manner Of Notice Thereof; And (II) An Order (A) Authorizing Procedures For The Sale Of Substantially All Of The Debtors' Assets Free And Clear Of Liens And (B) Authorizing The Assumption And Assignment Of Executory Contracts And Leases [DN 565]
6. Joinder Of Mall Road Shoppes Of Florence, LLC, Mohawk Properties Two, LLC, And Reliance Salisbury, LLC To Objection Of Washington Prime

Group Inc. D/B/AWP Glimcher [DN 559] To Debtors' Motion For (I) An Order (A) Approving Procedures For The Proposed Sale Of Substantially All Of The Debtors' Assets And The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, (B) Approving The Establishment Of Cure Amounts, And (C) Approving The Form and Manner Of Notice Thereof; And (II) An Order (A) Authorizing Procedures For The Sale Of Substantially All Of The Debtors' Assets Free And Clear Of Liens, (B) Authorizing The Assumption And Assignment Of Executory Contracts And Leases, And (C) Granting Related Relief [DN 567]

7. Limited Objection Of Gem Realty Capital, Inc., Starwood Retail Partners LLC, And The Prudential Insurance Company Of America To The Debtors Motion For (I) An Order (A) Approving Procedures For The Proposed Sale Of Substantially All Of The Debtors' Assets And The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, (B) Approving The Establishment Of Cure Amounts, And (C) Approving The Form and Manner Of Notice Thereof; And (II) An Order (A) Authorizing Procedures For The Sale Of Substantially All Of The Debtors' Assets Free And Clear Of Liens, (B) Authorizing The Assumption And Assignment Of Executory Contracts And Leases, And (C) Granting Related Relief [DN 568]
8. Ad Hoc Consortium Of Consignment Vendors' Objection To The Debtors' Sale Motion. [DN 571]
9. Limited Objection Of The Official Committee Of Unsecured Creditors To The Debtors' Motion For (I) An Order (A) Approving Procedures For The Proposed Sale Of Substantially All Of The Debtors' Assets And The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, (B) Approving The Establishment Of Cure Amounts, And (C) Approving The Form and Manner Of Notice Thereof; And (II) An Order (A) Authorizing Procedures For The Sale Of Substantially All Of The Debtors' Assets Free And Clear Of Liens, (B) Authorizing The Assumption And Assignment Of Executory Contracts And Leases, And (C) Granting Related Relief [DN 572]
10. Bridgestone Multimedia Group's Joinder In Ad Hoc Consortium Of Consignment Vendors' Objection To The Debtors' Sale Motion [DN 574]
11. Joinder Of Cornerstone Tinley Park LLC To Objection Of Washington Prime Group Inc. D/B/AWP Glimcher [DN 559] To Debtors' Motion For (I) An Order (A) Approving Procedures For The Proposed Sale Of Substantially All Of The Debtors' Assets And The Assumption And Assignment Of Certain Executory Contracts And Unexpired Leases, (B) Approving The Establishment Of Cure Amounts, And (C) Approving The Form and Manner Of Notice Thereof; And (II) An Order (A) Authorizing Procedures For The Sale Of Substantially All Of The Debtors' Assets Free And Clear Of Liens,

(B) Authorizing The Assumption And Assignment Of Executory Contracts And Leases, And (C) Granting Related Relief [DN 575]

Related Documents:

1. Notice of Filing Asset Purchase Agreement Template to be Used by Potential Bidders as Part of Bid Package [DN 518]
2. Debtors' Omnibus Responses to Objections [DN 577]

Status. This matter is going forward.

III. STATUS CONFERENCE

- A. United Methodist Publishing House, Inc. et al. vs. Family Christian LLC
Adversary Proceeding No. 15-80062

END OF AGENDA

Respectfully submitted,
KELLER & ALMASSIAN, PLC

Dated: April 13, 2015

/s/ Greg Ekdahl
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